

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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OCT 19 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Amendment of Section 73.202(b))	MM Docket No. 98-154
Table of Allotments)	RM-9174
FM Broadcast Stations)	
(Kosciusko and Goodman)	
Mississippi))	

To: Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

COMMENTS

Rainey Broadcasting, Inc. ("RBI"), by its counsel, hereby submits its Comments in response to the Commission's *Notice of Proposed Rule Making*, 63 FR 46978 (Sept. 3, 1998) ("NPRM"). At RBI's request, the NPRM proposes reallocating Channel 277C3 from Kosciusko, Mississippi to Goodman, Mississippi. In these Comments, and as will be explained, RBI respectfully requests that, instead of reallocating Channel 277C3 to Goodman, the Commission reallocate Channel 277C3 to Decatur, Mississippi. In support hereof, RBI states as follows:

PRELIMINARY MATTER

1. This proceeding was commenced by a Petition for Rule Making ("Petition") which RBI filed on September 17, 1997, proposing the reallocation of Channel 277C3 from Kosciusko to Goodman. At that time RBI was awaiting the grant of a construction permit for the Kosciusko facility on Channel 277C3. RBI proposed the reallocation of that channel to Goodman because it would provide the community of Goodman with its first local service and because it would have

024

enabled RBI to consolidate its radio operations in the Goodman area with another station that it owned in nearby Pickens, Mississippi.

2. The Allocations Branch erroneously dismissed RBI's Petition in a January 7, 1998 letter ruling. The Branch claimed that the Petition could not be processed because there were two mutually exclusive applications for the original Kosciusko allotment, when in fact, the other application that was mutually exclusive to RBI's application for Kosciusko had already been dismissed on November 6, 1997, and the Allocations Branch had been notified of that fact in a supplemental filing.¹

3. Nevertheless RBI has since sold the station that it owned in Pickens and thus will no longer be able to recognize the benefits of consolidated operations at the Goodman location. Given the passage of time since the filing of the Petition and the change of circumstances, RBI respectfully withdraws its proposal to reallocate Channel 277C3 to Goodman. RBI now prefers to serve Decatur, Mississippi and provide a first local service to those residents². RBI hereby states that if the Commission grants this counterproposal, it will file an application to modify its construction permit to serve Decatur and construct the facility.

CHANGE IN COMMUNITY OF LICENSE

4. This proposal meets the requirements set forth in *Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of*

1. The Allocations Branch recognized this factual error in footnote 1 of the NPRM.

2. RBI will be able to take advantage of the benefits of consolidated operations upon reallocation of Channel 277C3 to Decatur because RBI owns other radio stations in Newton County where Decatur is located.

License, 4 FCC Rcd 4870 (1989), *recons granted in part*, 5 FCC Rcd 2094 (1990). Decatur, in Newton County, has a population of 1,247 (1990 U.S. Census) and has no local service. Kosciusko, on the other hand, is served by three local radio stations, WBKJ(FM), WJTA(FM) and WKOZ(AM). Thus, Decatur would receive a priority for a first local service over a fourth local service to Kosciusko. See Revision of FM Assignment Policies and Procedures 90 FCC 2d 88 (1982).

5. As shown in the attached Engineering Statement, the allotment of Channel 277C3 to Decatur is in conflict with the retention of Channel 277C3 at Kosciusko. Otherwise, the proposed allotment to Decatur meets the Commission's spacing requirements.

6. Decatur is not located in any urbanized area, nor will the proposed 70 dBu coverage area reach any part of an urbanized area. The Town of Decatur is an established community whose residents share common interests and identify with their town. As demonstrated below, Decatur has the social, economic and governmental indicia to qualify as a community for allotment purposes.

7. Government. Decatur, the county seat of Newton County, was settled in 1836. It has a Mayor-Board of Alderman form of government and twenty-one Town employees, including a Town Clerk, Town Attorney and Town Judge. The Mayor and the five Alderman are each elected for four-year terms. The Town of Decatur operates the Decatur Police Department and Decatur Fire Department. Municipal services provided to the residents by the Town include water, sewer and garbage. Decatur Public Library offers reading materials to the community. Children in Decatur attend Newton County Schools. Newton County Academy, a private school, is also located in Decatur. In addition, East Central Junior College is located in Decatur and offers a wide variety of courses to its students. The Town has its own zip code, 39327, and the U.S. Postal Service operates

a Post Office at 800 4th Avenue in Decatur to service the area. According to the U.S. Census Bureau, the population of Decatur in 1990 was 1,247.

8. Cultural. There are several events held annually for the residents of Decatur. These include an Oktober Fest celebration with food, displays, entertainment, and arts and crafts, and the annual Christmas Parade. Residents of Decatur can enjoy recreational activities at the Turkey Creek Water Park, which offers picnicking, camping, swimming, fishing, boating and a 260-acre lake, and at the Decatur Recreation Center. Decatur also has a lighted baseball complex where tee-ball, little league, softball and pony league games are played. In addition, the Decatur Country Club has an 18 hole golf course, swimming pool, and tennis facilities. Stage productions, musicals, dramas and comedies are offered at East Central Community College.

9. There are many churches located within the Town of Decatur, including the Decatur Methodist Church, Beulah Baptist Church, Church of God in Christ, Decatur United Methodist Church, Clarke Venable Baptist Church, Decatur Mb Church, and Oakland Baptist Church. Community and civic organizations in Decatur include the Lions Club, Woman's Progressive Club, Homemaker Club, County Capital Garden Club, Jaycees, Eastern Star, Masons, American Legion, Boy Scouts and Girl Scouts.

10. Business. There are numerous businesses located within the Town of Decatur, as illustrated in the attached business listing. *See Exhibit 1*. To promote business development in the community, there is a Greater Decatur Chamber of Commerce. A number of businesses identify with the Town by using "Decatur" in their name, including: Decatur Furniture & Appliance, Decatur Meadows Apartments, Decatur Mini-Storage, Decatur Telephone Company, and South Decatur

Service Station. Manufacturers located in Decatur include BonHomme Manufacturing, which makes apparel, and Peavey Electronics, which makes musical equipment.

11. The financial needs of the residents are served by the Bank of Decatur, Eastover Bank for Savings and Union Planters Bank. Health services are available at the Decatur Medical Clinic and the Laird Medical Clinic, and dental services are provided by a local dentist, James E. Yelverton, Jr. DDS. Ambulance service is also available in Decatur.


12. As demonstrated above, the Town of Decatur qualifies as a community for allotment purposes due to its independent government body, community identity, and numerous businesses. As such, it is deserving of its first local service.

13. Since Channel 277C3 is currently unused at Kosciusko, despite the change in the proposed transmitter site there will be no actual loss in existing service. *See, e.g., Midway, Panacea and Quincy, Florida*, 10 FCC Rcd 6112 (1995); and *Douglas, Tifton and Unionville, Georgia*, 10 FCC Rcd 7706 (1995). The proposed 60 dBu coverage of Channel 277C3 will provide service to a greater area and population than the previously proposed 60 dBu coverage area for Channel 277C3 at Kosciusko. The net gain in population is 52,043 persons. See Exhibit 3 of the Engineering Statement. The loss area will continue to receive at least five (5) aural services.

14. Accordingly, Rainey Broadcasting, Inc. submits these comments to reallocate Channel 277C3 from Kosciusko, Mississippi to Decatur, Mississippi, in order to provide a first local service, and to modify the permit of RBI accordingly.

Respectfully submitted,

RAINEY BROADCASTING, INC.

By: 
Mark N. Lipp, Esq.
Shook Hardy & Bacon, LLP
1850 K Street, NW
Suite 900
Washington, DC 20006
(202) 261-2045

October 19, 1998

ENGINEERING STATEMENT

In Support of A

COUNTERPROPOSAL

MM Docket 98-154, RM-9174

Rainey Broadcasting, Inc.

INTRODUCTION

The instant engineering statement is submitted in support of a counterproposal in the above captioned Docket. Rainey Broadcasting, Inc. ("Rainey") is the permittee of WZKR(FM) at Kosciusko, Mississippi. The Commission issued a Notice of Proposed Rule Making ("NPRM") with the Comments Date of October 19, 1998. See DA 98-1683.

A detailed engineering study was conducted which determined that channel 277C3 at Kosciusko is mutually exclusive with the same channel in the immediate area of Decatur, Mississippi. At the Decatur reference, channel 277C3 meets all spacing requirements with no other channel substitutions required.

Rainey proposes that channel 277C3 be deleted at Kosciusko and allotted to Decatur as that community's first local service. It requests that the CP of WZKR be modified accordingly.

The attached exhibits provide documentation that the Rainey Counterproposal is in compliance all known Commission Rules and Regulations concerning changes in a community of license.

EXHIBITS EXPLAINED

Exhibit E, figure 1 is an allocation study which uses the Rainey proposed reference coordinates. The study depicts the following things; 1) Channel 277C3 at the Decatur allotment site is MX with the CP site of WZKR at Kosciusko. Therefore, the Decatur allotment must be considered as a counterproposal. 2) the reference coordinates are only 5.00 kilometers from the proposed of community of license, Decatur, while a class C3 provides a 70 dBu contour of 23.2 kilometers. This data and the map depicted in Exhibit E, Figure 2 demonstrate that channel 277C3 at Decatur will provide the required 70 dBu to 100% of the community. 3) The spacing to all other licensed, CP and proposed (allotment) facilities receives the required spacing of §73.207. This is further exhibited in Exhibit E, figure 3 which is a map depicting the separation contours of the FM facilities included in Exhibit E, figure 1.

Exhibit E, figure 2 is a color map generated using the professional mapping program, **MapInfo, V 5.0**. The channel 277C3 at Decatur reference coordinates were plotted by computer and a hypothetical 23.2 kilometer 70 dBu contour included. At no point does the community boundaries approach the 70 dBu contour.

Exhibit E, figure 3 is a map developed using a V-Soft "INTERDLG" V 4.5 program. Here the FM facilities included in Exhibit E, figure 1 are shown as separation contours. The intersecting of the separation contours of WMBC (ch

276C2) Columbus, MS @ 26°, WQST (Ch 223C) Forest, MS @ 263.5° and WHER (ch 279C) Hattiesburg, MS @ 182.3° create the allotment clear spaced window. However, a wide area under §73.215 is available for antenna sites.

Exhibit E, figure 4 is a map which depicts the present WZKR 60 dBu service contour and the proposed 60 dBu of channel 277C3 at Decatur. There is no point where the contours overlap. Therefore, all area inside the WZKR CP site is shown as "loss" and all area inside the AD 277C3 at Decatur is considered "gain." The results of this study can summarize as follows;

Community	Present		Proposed		Gain	
	<u>Area</u>	<u>Pop</u>	<u>Area</u>	<u>Pop</u>	<u>Area</u>	<u>Pop</u>
Kosciusko	4,757	50,598				
Goodman			4,803	102,641	46	52,043

The population gain is shown in the number of persons and the area gain is depicted in square kilometers. The study depicts a small area gain (46 square kilometers) but a gain of 52,043 persons.

REMAINING SERVICE

After channel 277C3 is deleted at Kosciusko the community will continue to be served by three local services; WJTA(FM) (ch 219), WBKJ (ch 286C1) and WKOZ-AM (1340 kHz). In addition, all of the present WZKR 60 dBu area (loss) will continue to receive a minimum of five aural services. Exhibit E, figure 5 is a MapInfo generated map of the present WZKR 60 dBu. The remaining services are

depicted using AM .5 mV/m and FM 60 dBu contours. Each contour is numbered and corresponds to the facility listed in Exhibit E, figure 6. The facilities shown in this exhibit verify that in no area of the present WZKR 60 dBu will there be less than 5 remaining services.

CONCLUSION

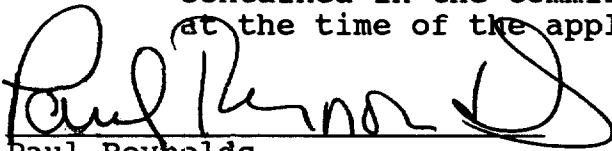
The instant engineering study clearly depicts that channel 277C3 can be deleted at Kosciusko and allotted to Decatur. The study also depicts that the allotment can be performed in keeping with the Commission's Rules concerning the criteria for a change in an FM facility's community of license. No additional channel changes are required and the gains depicted demonstrate that the proposed change in keeping with the Commission's allotment requirements.

ENGINEERING CERTIFICATION

STATE OF ALABAMA)
)
BUTLER COUNTY)

Paul Reynolds declares the following:


- * That he has completed undergraduate studies in the field of communications at the University of Southern Mississippi.
- * That he has completed course requirements for a Masters Degree in communications at the University of Alabama.
- * That he has completed basic electronics at DeVry Technical Institute.
- * That he has been operating as an independent communications consultant since 1980.
- * That he is familiar with the Commission's Rules and Regulations.
- * That the engineering for the instant Rainey Broadcasting, Inc. Counterproposal in MM Docket 98-154, RM-9174 was prepared by him or under his direct supervision.
- * That all information presented is believed to be true and correct and in full compliance of the technical standards contained in the Commission's Rules and Regulations in affect at the time of the applicant's filing date.


Paul Reynolds

REYNOLDS TECHNICAL ASSOCIATES
301 Cedar Street Suite 4
Greenville, AL 36037

(334) 382-3239

Sworn to and subscribed before, this ____ day of _____, 1998.

 My commission expires 7-15-2000

ENGINEERING STATEMENT

In Support of A

COUNTERPROPOSAL

MM Docket 98-154, RM-9174

Rainey Broadcasting, Inc.

ALLOTMENT STUDY - CH 277C3 @ DECATUR, MS
[DEPICTING MX SPACING WITH WZKR KOSCIUSKO
& CLEAR SPACING TO ALL OTHER FM FACILITIES]
(USING COUNTERPROPOSAL COORDINATES AS REFERENCE)

32 23 42 N.

89 05 42 W.

Class C3

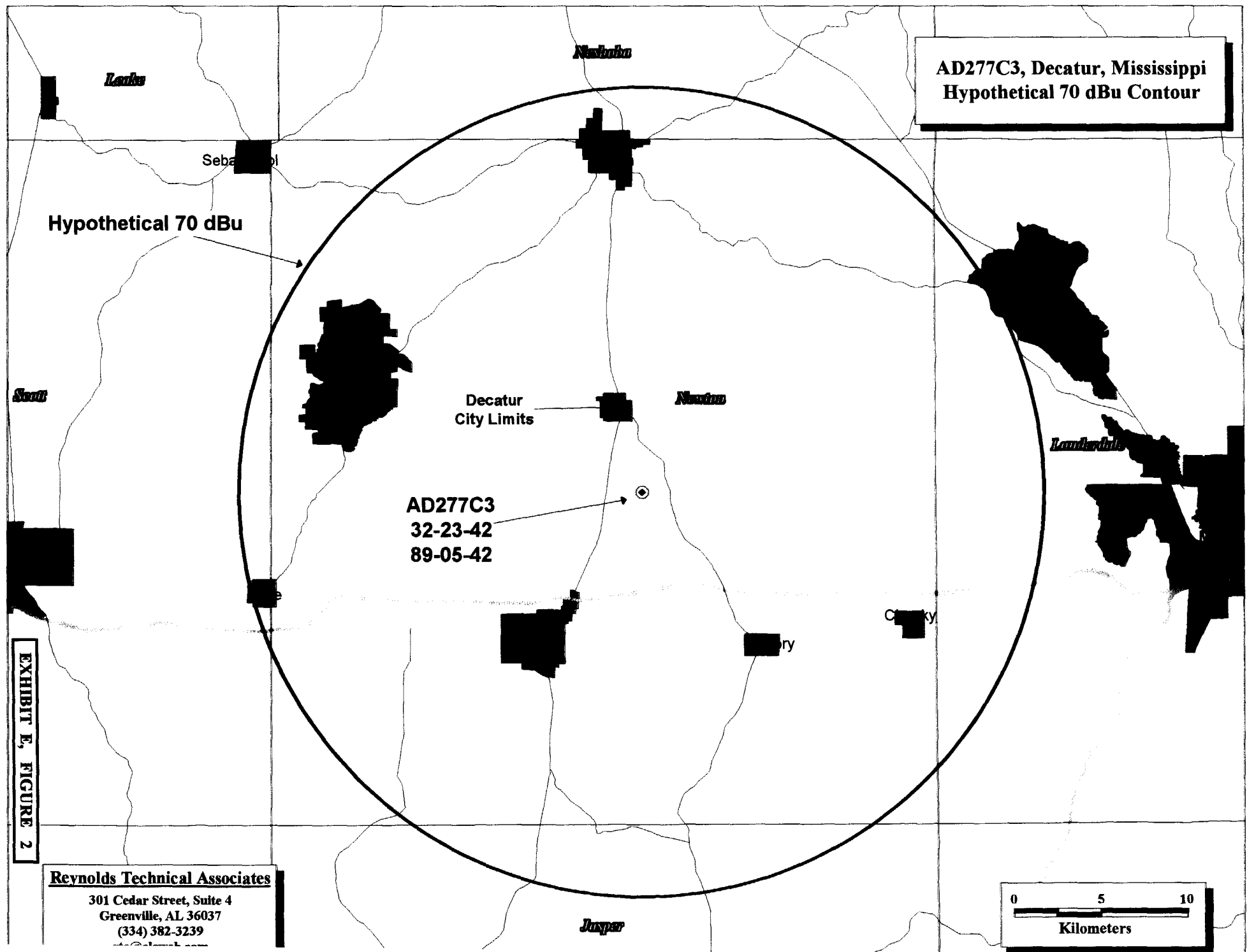
Current rules spacings

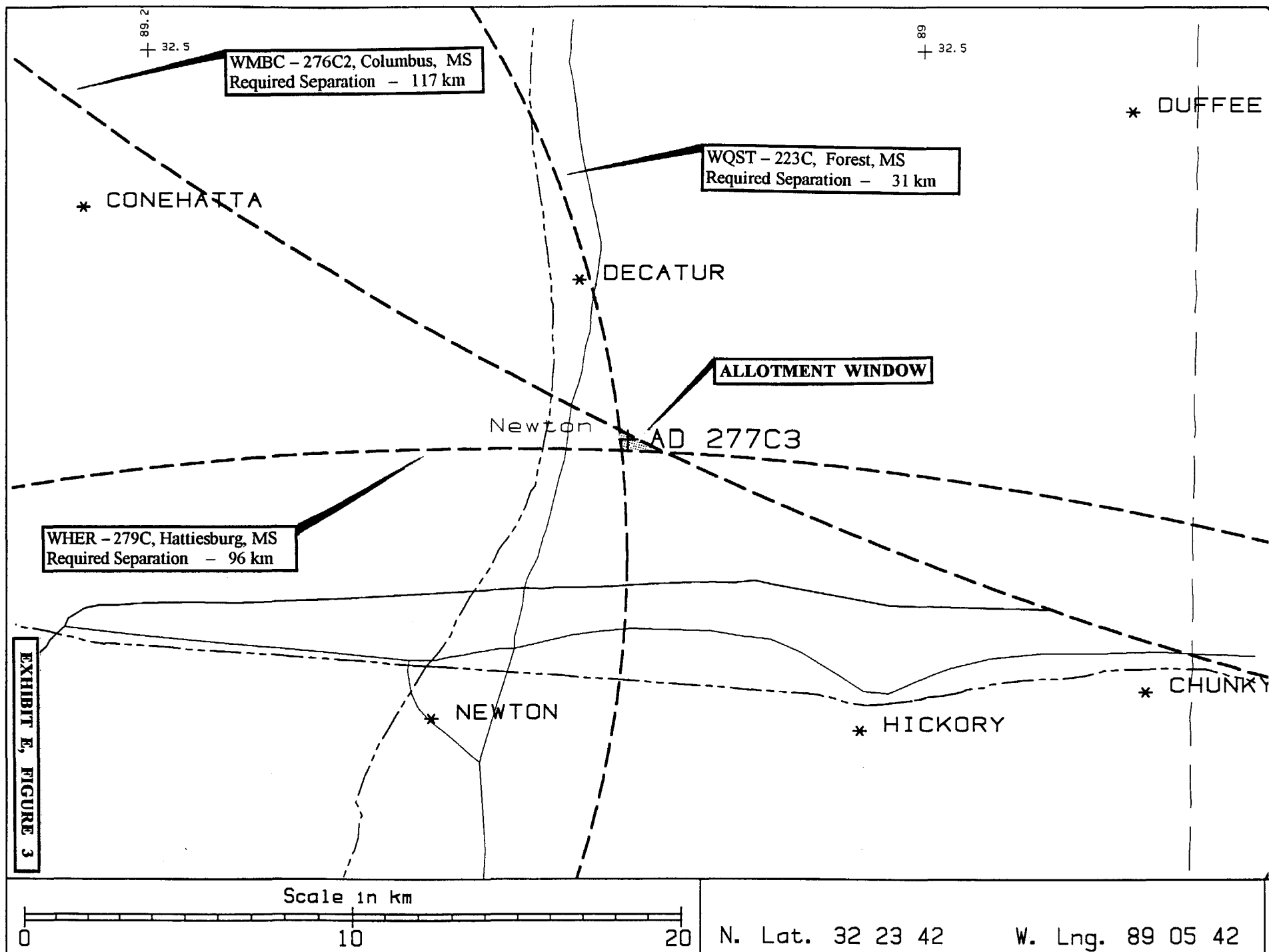
Search Date

10-08-19

Call	Ch#	City	Channel	State	Bear'	Dist'	R'qrd	Margin
Community of Decatur				MS	342.7	5.00		
Reference Coordinates:								
North Latitude: 32-26-17								
West Longitude: 89-09-39								
WZKR.C	277C3	Kosciusko		MS	317.4	87.32	153.0	-65.68 *
DE277	277C3	Kosciusko		MS	317.7	87.34	153.0	-65.66 *
Of No Concern:								
CP Site & Facility								
of Petitioner								
AD277	277C3	Goodman		MS	310.4	99.92	153.0	-53.08 *
Of No Concern:								
Pending PRM								
of Petitioner								
WMBCFM	276C2	Columbus		MS	26.0	117.14	117.0	0.14 *
WQSTFM	223C	Forest		MS	263.5	31.23	31.0	0.23 *
WHER	279C	Hattiesburg		MS	182.3	96.33	96.0	0.33 *
WMSI	275C	Jackson		MS	260.5	122.85	96.0	26.85
WMXS	277C	Montgomery		AL	89.8	272.69	237.0	35.69
WKJNFM	277C	Hammond		LA	217.0	276.68	237.0	39.68
WRBO	278C	New Albany		MS	5.0	222.99	176.0	46.99

EXHIBIT E, FIGURE 1





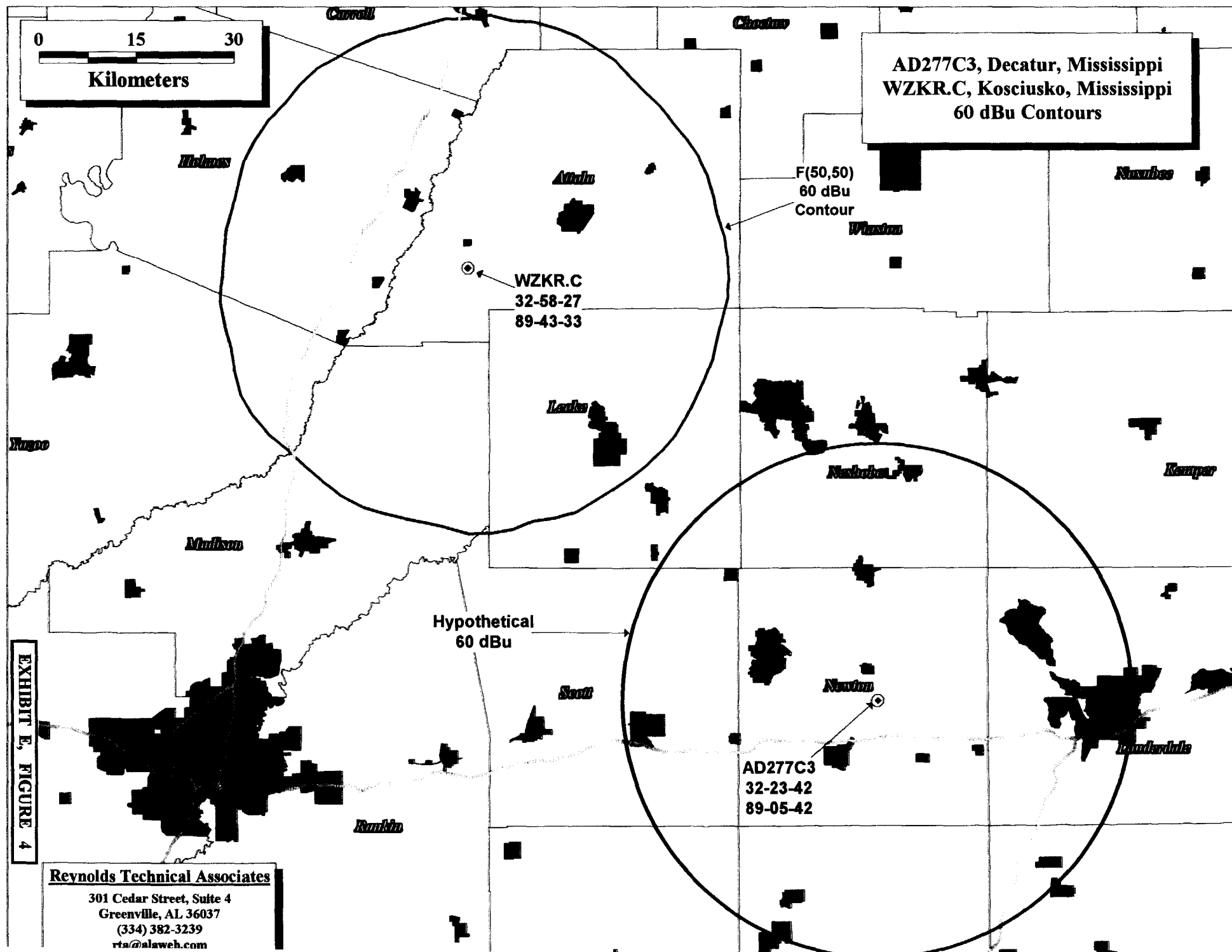


EXHIBIT 1



Newton County, Mississippi

Community Links

[Newton County GenWeb Project](#)
[Towns in Newton County](#)

[Add a link](#)

[Local County & Genealogical Resources](#)

General Information

County Seat: Decatur

Newton County was named for Sir Isaac Newton (1642-1727), the English mathematician, who was knighted by Queen Anne in 1705 and who is celebrated for his discoveries in the field of optics and for his formulations of the laws of motion and gravity. Newton County, Mississippi, is the only American county named for Sir Isaac Newton. (If the county had been formed and named in 1833, at the same time as Jasper County, there would be reason to believe that it was named for Sergeant John Newton rather than for Sir Isaac Newton. See | 38, Jasper County, ante.)

The town of Newton, in Newton County, sometimes is said to have been named for Newton Dolittle, who donated the land for the town.

Decatur was named for Commodore Stephen F. Decatur (1779-1820), a native of Maryland and a naval hero of the War of 1812 and the war with the Barbary states, who is remembered for the toast, "Our country: In her intercourse with foreign nations may she ever be in the right; but our country, right or wrong".

Other county seats named for him are the cities and towns of Decatur in Alabama, Georgia, Illinois, Indiana, Tennessee and Texas, and the town of Decaturville in Tennessee. There are Decatur counties named for him in Georgia, Indiana, Iowa, Kansas and Tennessee.

Formed under Second Constitution (1832-1869) - February 25, 1836

Newton County was established by an act of February 25, 1836, from the southern half of Neshoba County.

Leake
County

Neshoba
County

Kemper
County

Scott
County

Lauderdale
County

Smith
County

Jasper
County

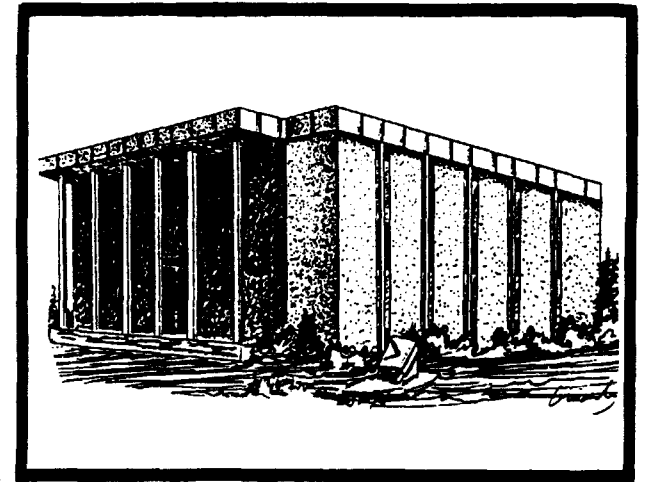
Clarke
County



RECREATION - Decatur residents enjoy year-round events. The Newton County Community Concert Association presents three concerts a year offering a variety of entertainment. East Central Community College offers stage productions, musicals, dramas and comedies. Decatur has a new lighted baseball complex where tee-ball, little league, softball and pony league games are played. Located 3½ miles south of Decatur is Turkey Creek Water Park. This 788 acre park offers recreational activities such as fishing, skiing, and overnight camping with hook-ups. Oktober Fest is held the second Saturday in October each year with arts and crafts, displays, food and entertainment for the entire family. The Decatur Country Club has an 18 hole golf course, swimming pool, and tennis facilities. Decatur Senior Citizen's Center serves meals at noon five days a week (Monday thru Friday).

Decatur Decatur Chamber of Commerce
at Office Box 474
Decatur, MS 39327

**Welcome
to**

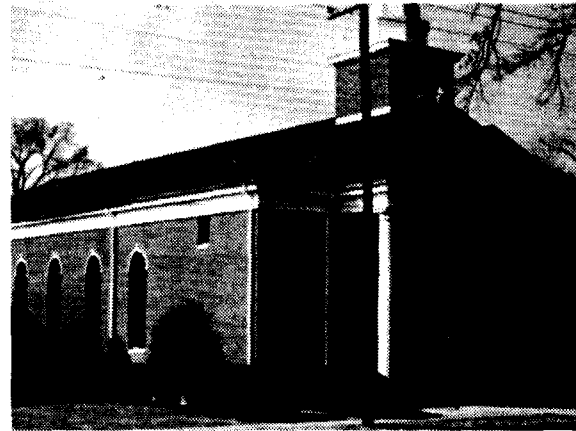
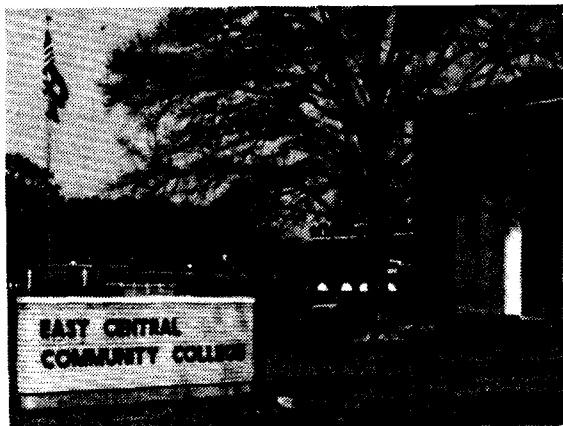


**Town
of
Decatur**

Decatur is the county seat of Newton County located in East Central Mississippi. It is 25 miles west of Meridian and 74 miles east of Jackson. It is ideally located with respect to other economically active regions and other variables influencing growth.

GENERAL INFORMATION

EDUCATION - Decatur High School and Boler Elementary are part of the Newton County Unit School District. These schools have an enrollment of approximately 800 students and are recognized for their academic achievement. One private school in Decatur is Newton County Academy. East Central Community College, located in the heart of Decatur, has an enrollment of over 1200 students. Within a 100 mile radius of Decatur there are eight senior colleges and universities.



CHURCHES - Five churches representing 3 major denominations are located in the city.

HEALTH CARE - Modern medical care includes two private clinics, medical doctors, a dentist and the county health department. Located within a 10 mile radius are two hospitals and two convalescent homes. Decatur is covered by round-the-clock ambulance service.

UTILITIES - Mississippi Power Company, Entex Gas Corporation, Multi Vision Cable Company, Decatur Telephone Company, and Municipal Water serve the utility needs of the Decatur area.

CIVIC ORGANIZATIONS - In Decatur these include: Greater Decatur Chamber of Commerce, Lions Club, Woman's Progressive Club, Homemaker Club, County Capital Garden Club, Jaycees, Eastern Star, Masons, and the American Legion.

GOVERNMENT SERVICES - Decatur operates under a mayor and board of alderman form of government. Three full time policemen and 20 volunteer firemen with the latest equipment serve Decatur. Newton County's government offices as well as many other government agencies are located in the town.

FINANCIAL FACILITIES - The financial needs of the community are served by the Bank of Decatur (assets of \$155,754,000) and Eastover Bank for Savings (assets of \$553,000,000).

AGRICULTURE & INDUSTRY - Forestry, poultry, beef cattle, and dairy make up a majority portion of Newton County's large agricultural industry. Decatur has two industries: BonHomme Manufacturing which is known for making name-brand men's and women's apparel and Peavey Electronics which makes musical equipment sold throughout the world.

TRANSPORTATION - Highway 15, the most traveled highway in Newton County, runs through Decatur. Located 7 miles south of Decatur is Interstate 20. Two major airports are located less than an hour away.

FACTS ABOUT NEWTON COUNTY

NEWTON COUNTY, IN EAST CENTRAL MISSISSIPPI, IS LOCATED 65 MILES EAST JACKSON --- 25 MILES WEST OF MERIDIAN. IT IS COMPROMISED OF 16 TOWNSHIPS, WITH AN AREA OF 578 SQUARE MILES OR 370,560 ACRES. THE 1990 CENSUS LISTED THE POPULATION OF NEWTON COUNTY AS 20,291.

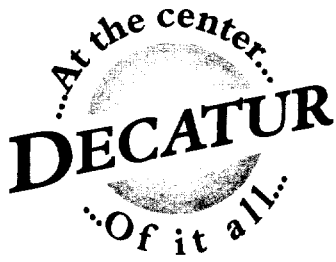
THE PEOPLE OF NEWTON COUNTY ARE PROUD OF THE MAJOR INDUSTRIES LOCATED WITHIN ITS BOUNDRIES; PEAVYS ELECTRONICS, ESCO CORPORATION TOOLS, LA-Z-BOY SOUTH CHAIRS, AND SOUTHERN MANUFACTURING - FURNITURE.

THERE ARE THREE PUBLIC SCHOOLS IN NEWTON COUNTY, LOCATED IN DECATUR, NEWTON AND UNION. THERE IS ALSO ONE PRIVATE SCHOOL LOCATED IN DECATUR. A CHOCTAW SCHOOL AND INDIAN RESERVATION IS LOCATED IN CONEHATTA. THERE IS ONE COMMUNITY COLLEGE IN THE COUNTY, EAST CENTRAL COMMUNITY COLLEGE IN DECATUR. THE COLLEGE OFFERS A WIDE VARIETY OF COURSES TO ITS STUDENTS, INCLUDING VOCATIONAL TECHNICAL COURSES IN ELECTRONICS, CABINET MAKING, COSMETOLOGY, BRICK-LAYING, BODY SHOP AND WELDING. IT ALSO HAS A NURSING PROGRAM.

FACTS ABOUT NEWTON COUNTY-continued

THERE ARE TWO FULLY EQUIPPED HOSPITALS LOCATED IN NEWTON COUNTY. ONE IS LOCATED IN NEWTON AND ONE IS LOCATED IN UNION. THERE ARE ALSO SEVERAL MEDICAL CLINICS LOCATED IN THE COUNTY. THE COUNTY ALSO HAS EXCELLENT NURSING HOME FACILITIES. AMBULANCE SERVICE IS PROVIDED BY A PRIVATE FIRM.

RECREATIONAL PLAYS A LARGE PART IN NEWTON COUNTY. IN 1984, PAT HARRISON WATERWAY COMPLETED THE TURKEY CREEK WATER PARK IN DECATUR, MISSISSIPPI, WHICH IS THE COUNTY SEAT. THIS RECREATIONAL FACILITY OFFERS PICKICKING, CAMPING, SWIMMING, FISHING AND BOATING. WITH THE PARK'S 260-ACRE LAKE, THERE IS ROOM FOR EVERYONE.



Town of
DECATUR

P.O. Box 307 - 66 Seventh Street

DECATUR, MISSISSIPPI 39327

Telephone: 601-635-2761 Fax: 601-635-4012

DAVID GRIFFIN
Mayor

JINYA LEA CLARKE
Clerk

BOBBY EVERETT
Town Attorney

DANNY CLEARMAN
Town Judge

ALDERMAN

ROBERT BURTON

LEON EATMON

KARLA RUSHING

ELEANOR RUSSELL

CHRIS SPEARS

Lisa Creel
Police Chief

<u>Business Name</u>	<u>Address</u>	<u>City</u>	<u>Phone</u>	<u>1</u>
<u>Decatur City Hall</u>	667 7th St	Decatur, MS	(601) 635-2761	
<u>Decatur City Water Works</u>	92 Broad St	Decatur, MS	(601) 635-2761	
<u>Decatur Fire Dept</u>	PO Box 307	Decatur, MS	(601) 635-2000	
<u>Decatur Police Dept</u>	92 Broad St	Decatur, MS	(601) 635-2761	
<u>Decatur Public Library</u>	PO Box 40	Decatur, MS	(601) 635-2777	
<u>US Post Office</u>	800 4th Ave	Decatur, MS	(601) 635-2050	



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39327 is associated with the following:

City Name	State	For this ZIP Code, the city name is:	ZIP Code Type
DECATUR	MS	ACCEPTABLE (DEFAULT)	STANDARD

Version 3.2 Database 00/0000

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Decatur MS

Process

DECATUR MS

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following ZIP Codes:

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the city name is:

ZIP Code
Type

39327

ACCEPTABLE (DEFAULT)

STANDARD

Version 3.2 Database 09/1998

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 NJ|NM|NV|NY|OH
 OK|OR|PA|RI|SC
 SD|TN|TX|UT|VA
 VT|WA|WI|WV|WY

Primary and Secondary Schools in Mississippi Profile of Newton County School District

P.O. Box 97 Hwy 15 South / Decatur , MS 39327

(601) 635-2317 / FAX: / Students: 1,661 / Home Page N/A

- [Newton County / Mbrs of Congress / State Legislators / Media](#)
- [National Center for Education Statistics \(NCES\) School District Profile](#)

Newton County Elementary	H/P N/A	KG-06	<u>Decatur</u>	<u>39327</u>
Newton County High School	H/P N/A	09-12	<u>Decatur</u>	<u>39327</u>
Newton County Middle School	H/P N/A	07-08	<u>Decatur</u>	<u>39327</u>
Newton County Voc Complex	H/P N/A	00-00	<u>Decatur</u>	<u>39327</u>

Harden Political InfoSystems (HPI)
 Richard M. Harden ... hpi@atlanta.com ... 03/10/98

<u>Business Name</u>	<u>Address</u>	<u>City</u>	<u>Phone</u>		
<u>Baptist Student Union</u>	511 Broad St	Decatur, MS	(601) 635-2481		
<u>Beulah Baptist Church</u>	12130 Hic-Little Rock Rd	Decatur, MS	(601) 635-2515		
<u>Church Of God In Christ</u>	17585 Highway 15	Decatur, MS	(601) 635-3199		
<u>Clarke Venable Baptist Church</u>	362 W Broad St	Decatur, MS	(601) 635-2828		
<u>Decatur Mb Church</u>	PO Box 416	Decatur, MS	(601) 635-2190		
<u>Decatur Methodist Church</u>	244 W Broad	Decatur, MS	(601) 635-2729		
<u>Decatur United Methodist Chr</u>	268 W Broad St	Decatur, MS	(601) 635-3219		
<u>Newton County Baptist Assn</u>	14288 Highway 15	Decatur, MS	(601) 635-3655		
<u>Oakland Baptist Church</u>	355 Garrison Rd	Decatur, MS	(601) 635-2707		

College in religion and elementary education.

With the start of the 1989-90 college term, East Central Community College located in Decatur will enter its 62nd year of providing quality programs of study in the academic, technical, vocational, industrial, adult literacy and community service areas.

East Central changed its name from East Central Junior College on July 1, 1988, to reflect its comprehensive curriculum and variety of services it offers. It had opened its doors to a freshman class of 20 and a small faculty for the first regular session in September 1928.

In March 1939, East Central Junior College was accredited by the Commission on Colleges of the Southern Association of Colleges and Schools. The college has been reaffirmed each decade since its initial accreditation.

Originally the institution was supported by three counties — Newton, Neshoba and Scott. Later they were joined by Leake and Winston.

During the 1988-89 term, enrollment records were set for each semester. The fall semester enrollment totaled 1,189 students with a record 1,187 registering for classes during the spring term.

Dr. Eddie M. Smith, the college president, cited the quality of instruction, low cost for attending classes, the addition of new programs of study and an expanded evening class schedule — with courses offered throughout the five-county district — as major reasons for the consistent enrollment increase. And, although costs are reasonable, East Central offers a wide variety of financial aid programs, scholarships, etc. to help fund a student's education.

With assistance of the full-time academic and vocation-technical counsellors, faculty members serve as advisors in their respective fields to better assist students in their career planning. Serving as advisors, the college instructors actually anticipate student problems and needs as they arise and aid the students in every way possible.

The East Central president points with pride to progress reports from three of the state universities indicating that students transferring from the community college maintain grade point averages as high or higher who started as freshman at the university level.

To further illustrate the college's drive for academic excellence, East Central students have twice won the Mississippi Community and Junior College Scholars Bowl competition which is annually sponsored by the University of Mississippi.

And, the college's engineering club, Alpha Epsilon, was recently cited by the National Society of Professional Engineers as one of the top five community and junior college engineering organizations in the nation. The East Central chapter was also recognized as one of the top engineering clubs among all colleges and universities in the United States.

Beginning with the 1988-89 school year, under the administration, the office of Adult and Continuing Education, was organized to expand the evening class schedule and to assist the adult learners. As part of the college's Adult Basic Education program, East Central has implemented the use of the PALS Laboratory, where computers are used to help adults improve their reading, writing and math skills.



An increase in the adult student population has played a major role in the college's record enrollment total. In the above photo, mathematics instructor Mrs. Lois McMullan visits with some of her non-traditional students prior to her class lecture.



The college's consistent enrollment increase, additional programs of study, and many campus improvements have been made possible due largely to the leadership of Dr. Eddie M. Smith, left, who is beginning his fifth year as the school's president. Smith is shown with Board of Trustee Chairman Henry B. "Bubba" Hudspeth.

The college further assists adult students by offering, to those who qualify, their first college course "free of charge."

East Central offers a wide variety of programs of study for the academic, technical and vocational student.

University parallel programs include art and music, business education and business administration, elementary and secondary education, engineering, industrial education, liberal arts, physical education, pre-medical, pre-dental, pre-veterinary, medical technology, pre-nursing, pre-pharmacy and physical education.

Technical programs include business technology, computer technology, drafting and design technology, electronic technology and most recent programs, child care supervision technology and video production technology.

Vocational programs are automotive body and fender repair, automotive mechanics, carpentry and cabinet making, cosmetology, electricity, machine shop, masonry, refrigeration and air conditioning, and welding.

The college also operates the Philadelphia-Neshoba County Vocational-Technical Center. The center offers secondary trades instruction in electricity, carpentry and cabinet making, industrial sewing, intensive business, metal trades and automotive mechanics.

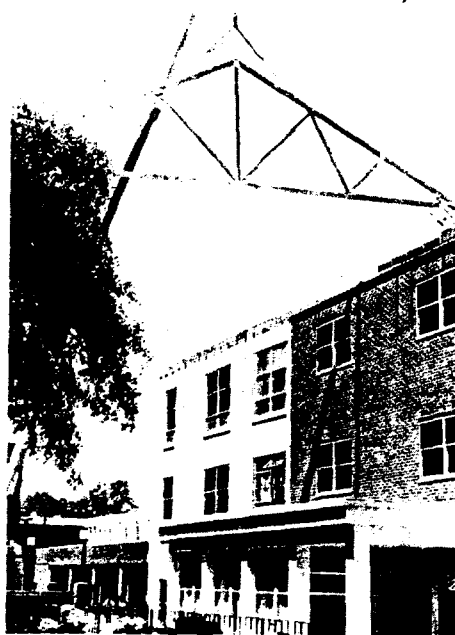
East Central plays a major role in its service to industries throughout the five-county area.

Smith said training is designed to meet the individual needs of any company with programs available through which the college works closely with local industry. Those programs include the upgrading of training for existing employees, pre-employment in the specific area of need and customized training as specific needs arise.

Nearing completion (which is scheduled by early August, 1989) is a dormitory renovation project which will provide better facilities for campus housing and further enhance the beauty of the campus.

To fund the dormitory renovation project, which includes four of the college's six residence halls, East Central received a low-interest Federal loan in the amount of \$1,457,000.

In addition to the Federal loan, all five county



A worker is shown positioning a truss on the roof of Jackson Hall, one of four campus dormitories designated for repairs and renovations on the East Central campus. The dormitory renovation project, which is scheduled for completion in early August, 1989, has been funded through a \$1.4 million low-interest Federal loan with financial assistance from Boards of Supervisors in the five county district. boards of supervisors (Leake, Neshoba, Newton, Scott and Winston) agreed to commit to additional appropriations to facilitate completion of the project.

"Without the leadership and financial support of our county supervisors, our dormitory renovation project could not be completed without causing a strain on the college budget. I would certainly like to say a big 'thank you' to our supervisors and express on behalf of the college our sincere appreciation for their support," the East Central president said.

Another renovation project underway is the refurbishing of Huff Auditorium, built in 1953. Solely through private contributions from alumni and friends of the college, phase one of the project, which included the installation of new

stage curtains and window drapes, has been completed with over \$10,000 in contribution having been received.

The college is currently soliciting support for phase two of the project which involves the installation of an air conditioning system at a projected cost of \$70,000.

Along with the instruction-side of college life, students at East Central are also provided many extra-curricular activities.

Organizations include Alpha Alpha Epsilon, for engineering and industrial arts majors; Mu Alpha Theta, honorary mathematics society; Phi Beta Lambda, organized for business students; Phi Theta Kappa, national honorary scholastic society; President's Council; Sigma Sigma Mu Tau, for students interested in medical careers; VICA (Vocational Industrial Clubs of America) and the Warrior Corps, an organization of students who assist in recruiting and serve as host and hostesses for special events and activities.

Active student Christian organizations include the Baptist Student Union, Wesley Foundation, Newman Club and Westminster Fellowship which serve as vital links between the student's local church and his or her Christian life as a college student.

The music and drama departments carry out an active program during the school year.

Besides an outstanding marching band which entertains during halftime ceremonies at football games, other entertaining groups include the Collegians, concert and jazz bands, brass ensemble, concert choir and gospel choir. These groups not only perform on campus, but also at other schools and at civic organizations throughout the district.

The drama department presents a dinner theater in the fall and a full-scale Broadway musical in the spring.

A full-scale athletic program is also conducted at East Central which is a member of the National Junior College Athletic Association. The college participates in intercollegiate football, men's and women's basketball, and spring sports such as baseball, tennis and golf.

In addition to an active athletic program, the college also offers a highly diversified intramural program including flag football, basketball, softball, volleyball, table tennis and pool.

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<u>Aramark-Eccc Student Ctr</u>	Broad St	Decatur, MS	(601) 635-3873
<u>Baptist Student Union</u>	511 Broad St	Decatur, MS	(601) 635-2481
<u>Barnham Funeral Home</u>	Highway 15 N	Decatur, MS	(601) 635-3200
<u>Beat 3 Garage</u>	7th St	Decatur, MS	(601) 635-2236
<u>Beulah Baptist Church</u>	12130 Hic-Little Rock Rd	Decatur, MS	(601) 635-2515
<u>Blonzell's Curtain Shop</u>	Broad St	Decatur, MS	(601) 635-3811
<u>Buntyn's</u>	702 4th Ave	Decatur, MS	(601) 635-3507
<u>Chamber Of Commerce</u>	66 7th St	Decatur, MS	(601) 635-3863
<u>Chicken Basket</u>	Highway 15	Decatur, MS	(601) 635-2525
<u>Church Of God In Christ</u>	17585 Highway 15	Decatur, MS	(601) 635-3199
<u>Clarke Venable Baptist Church</u>	362 W Broad St	Decatur, MS	(601) 635-2828
<u>Clearman Danny K</u>	117 W Broad St	Decatur, MS	(601) 635-3432
<u>Community Financial Svc</u>	423 W Broad St	Decatur, MS	(601) 635-4481
<u>Corrections Dept</u>		Decatur, MS	(601) 635-3384
<u>D & D Pawn Shop</u>	7 S 5th Ave	Decatur, MS	(601) 635-4199
<u>Decatur City Hall</u>	667 7th St	Decatur, MS	(601) 635-2761
<u>Decatur Fire Dept</u>	PO Box 307	Decatur, MS	(601) 635-2000
<u>Decatur Furniture & Appliance</u>	408 W Broad St	Decatur, MS	(601) 635-2610
<u>Decatur Mb Church</u>	PO Box 416	Decatur, MS	(601) 635-2190

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<u>Decatur Meadows Apts</u>	280 Little Rock Decatur Rd	Decatur, MS	(601) 635-3423
<u>Decatur Medical Clinic</u>	68 4th Ave	Decatur, MS	(601) 635-2258
<u>Decatur Methodist Church</u>	244 W Broad	Decatur, MS	(601) 635-2729
<u>Decatur Police Dept</u>	92 Broad St	Decatur, MS	(601) 635-2761
<u>Decatur Public Library</u>	PO Box 40	Decatur, MS	(601) 635-2777
<u>Decatur Recreation Ctr</u>	15267 Highway 503	Decatur, MS	(601) 635-2077
<u>Decatur Summer Youth</u>	6294 Decatur Conehatta Rd	Decatur, MS	(601) 635-3378
<u>Decatur Telephone Co</u>	149 7th St	Decatur, MS	(601) 635-2251
<u>Decatur United Methodist Chr</u>	268 W Broad St	Decatur, MS	(601) 635-3219
<u>District One Garage</u>		Decatur, MS	(601) 635-2158
<u>Dixie Oil Co</u>	Highway 15 N	Decatur, MS	(601) 635-2808
<u>East Central Alternative Schl</u>	273 10th St	Decatur, MS	(601) 635-2118
<u>East Central Home Health Rgn B</u>	Highway 15 S	Decatur, MS	(601) 635-2648
<u>East Central Junior College</u>	Broad St	Decatur, MS	(601) 635-2111
<u>Ed's Machine Tool Svc</u>	7580 Decatur Conehatta Rd	Decatur, MS	(601) 635-4328
<u>Employment Service</u>	7th St	Decatur, MS	(601) 635-2078
<u>Extension Area</u>	65 7th St	Decatur, MS	(601) 635-3642
<u>Forestry Dept</u>	15309 Highway 15	Decatur, MS	(601) 635-2051
<u>Great Southern National Bank</u>	421 W Broad St	Decatur, MS	(601) 635-3960
<u>Gussman's Garage</u>	16023 Highway 15	Decatur, MS	(601) 635-3595

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<u>Heflin's Texaco</u>	Highway 15 N	Decatur, MS	(601) 635-2326
<u>Howard's Auto Sales</u>	15399 Highway 15 N	Decatur, MS	(601) 635-4214
<u>Iga Foodliner</u>	39 7th St	Decatur, MS	(601) 635-3430
<u>Interest Food</u>	Highway 15	Decatur, MS	(601) 635-3301
<u>James B Everett - James B Everett Attorney Law</u>	175 7th St	Decatur, MS	(601) 635-2526
<u>Jean's Beauty Shop</u>	400 W Broad St	Decatur, MS	(601) 635-2716
<u>Johnson Jr W H</u>	117 W Broad St	Decatur, MS	(601) 635-2727
<u>Kathy's Kut & Kurl</u>	415 7th St	Decatur, MS	(601) 635-3385
<u>Kids World</u>	218 S 5th Ave	Decatur, MS	(601) 635-3111
<u>Longview Terrace Apt</u>	15162 Highway 15 S	Decatur, MS	(601) 635-3814
<u>M D Metals Scrap & Salvage</u>	7974 Decatur Conehatta Rd	Decatur, MS	(601) 635-4160
<u>Millhouse Printing</u>	153 W Broad St	Decatur, MS	(601) 635-2292
<u>Miss Christian Svc Camp</u>	12194 Highway 15	Decatur, MS	(601) 635-2697
<u>Mississippi Wic Distr</u>	75 Wic Rd	Decatur, MS	(601) 635-2129
<u>Moses Auto Repair Svc</u>	3838 Sand Springs Church Rd	Decatur, MS	(601) 635-2438
<u>National Guard</u>	15738 Highway 15 N	Decatur, MS	(601) 635-2127
<u>Natural Resources Conservation</u>	220 Little Rock Decatur Rd # B	Decatur, MS	(601) 635-2327
<u>Newton Board Of Surervisors</u>	Broad St	Decatur, MS	(601) 635-3444
<u>Newton Circuit Judge</u>	Broad St Fl 2	Decatur, MS	(601) 635-3540
<u>Newton County Academy</u>	14602 Highway 15 S	Decatur, MS	(601) 635-2756

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<u>Newton County Agent</u>	65 7th St	Decatur, MS	(601) 635-2267
<u>Newton County Baptist Assn</u>	14288 Highway 15	Decatur, MS	(601) 635-3655
<u>Newton County Chancery Clerk</u>	92 W Broad St	Decatur, MS	(601) 635-2367
<u>Newton County Circuit Clerk</u>	92 Broad St	Decatur, MS	(601) 635-2368
<u>Newton County Elementary Schl</u>	1024 Highway 15n	Decatur, MS	(601) 635-2956
<u>Newton County High School</u>	16255 Highway 503	Decatur, MS	(601) 635-2718
<u>Newton County Home Economist</u>	65 7th St	Decatur, MS	(601) 635-2268
<u>Newton County Home Health Dept</u>	15776 Highway 15	Decatur, MS	(601) 635-3453
<u>Newton County Home Health Svc</u>	Highway 15 N	Decatur, MS	(601) 635-2647
<u>Newton County Human Svc Dept</u>	14712 Highway 15 S	Decatur, MS	(601) 635-2346
<u>Newton County Justice Crt Clrk</u>	401 7th St	Decatur, MS	(601) 635-2740
<u>Newton County Purchasing Agent</u>	Broad St	Decatur, MS	(601) 635-3444
<u>Newton County Sheriff Office</u>	Broad St	Decatur, MS	(601) 635-2101
<u>Newton County Tax Assessor</u>	405 W Broad St	Decatur, MS	(601) 635-2517
<u>Newton County Veterans Svc</u>	State Highway 15 S	Decatur, MS	(601) 635-2178
<u>Oakland Baptist Church</u>	355 Garrison Rd	Decatur, MS	(601) 635-2707
<u>Oms</u>	15700 Highway 15	Decatur, MS	(601) 635-2177
<u>Orkin Exterminating Co</u>		Decatur, MS	(601) 635-4220
<u>Peavey Electronics Corp</u>	16389 Highway 503	Decatur, MS	(601) 635-2244
<u>Raymond Comans Tax Svc</u>	PO Box 272	Decatur, MS	(601) 635-3633

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<u>Red Barn Auction</u>	17384 Highway 15	Decatur, MS	(601) 635-3266		
<u>Robert Luke - Farm Bureau Insurance</u>	Highway 15 S	Decatur, MS	(601) 635-2700		
<u>Robert Luke - Newton County Farm Bureau</u>	14300 Highway 15 S	Decatur, MS	(601) 635-2260		
<u>Rural Economic & Community Dev</u>	220 Little Rock Decatur Rd # C	Decatur, MS	(601) 635-2347		
<u>Russell's Auto Sales</u>	19443 Highway 15	Decatur, MS	(601) 635-2449		
<u>Service America</u>	16389 Highway 503	Decatur, MS	(601) 635-4394		
<u>Shoe's Custom Paint & Body</u>	1837 Chapel Hill Rd	Decatur, MS	(601) 635-2125		
<u>Superintendent Of Education</u>	15305 Highway 15	Decatur, MS	(601) 635-2317		
<u>Surburban Auto Sales Inc</u>	Highway 15 N	Decatur, MS	(601) 635-2495		
<u>Trapp Harvey</u>	424 W Broad St	Decatur, MS	(601) 635-2686		
<u>Turkey Creek Water Park</u>	142 Parkway Dr	Decatur, MS	(601) 635-3314		
<u>Union Planters Bank</u>	15330 Highway 15 S	Decatur, MS	(601) 635-2321		
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<u>Weems Community Mental Health</u>	7th St	Decatur, MS	(601) 635-3342		
<u>Wildflower Florist</u>	152 W Broad St	Decatur, MS	(601) 635-4388		
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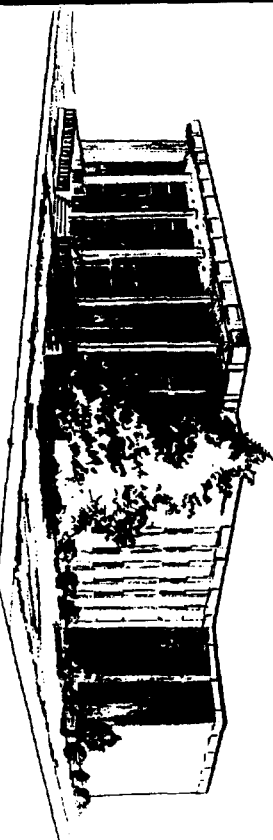


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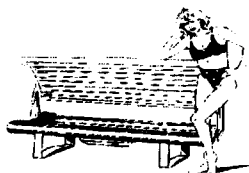
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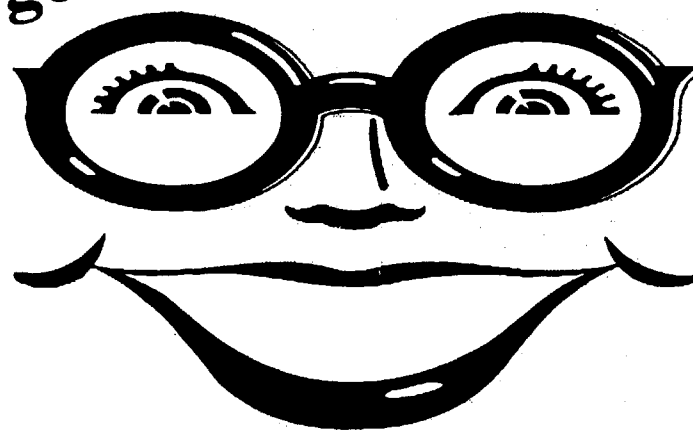
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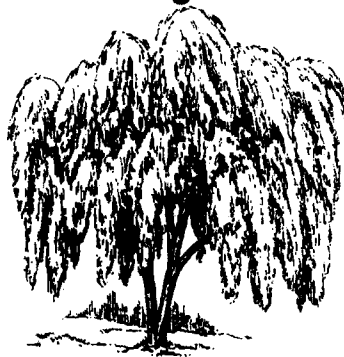
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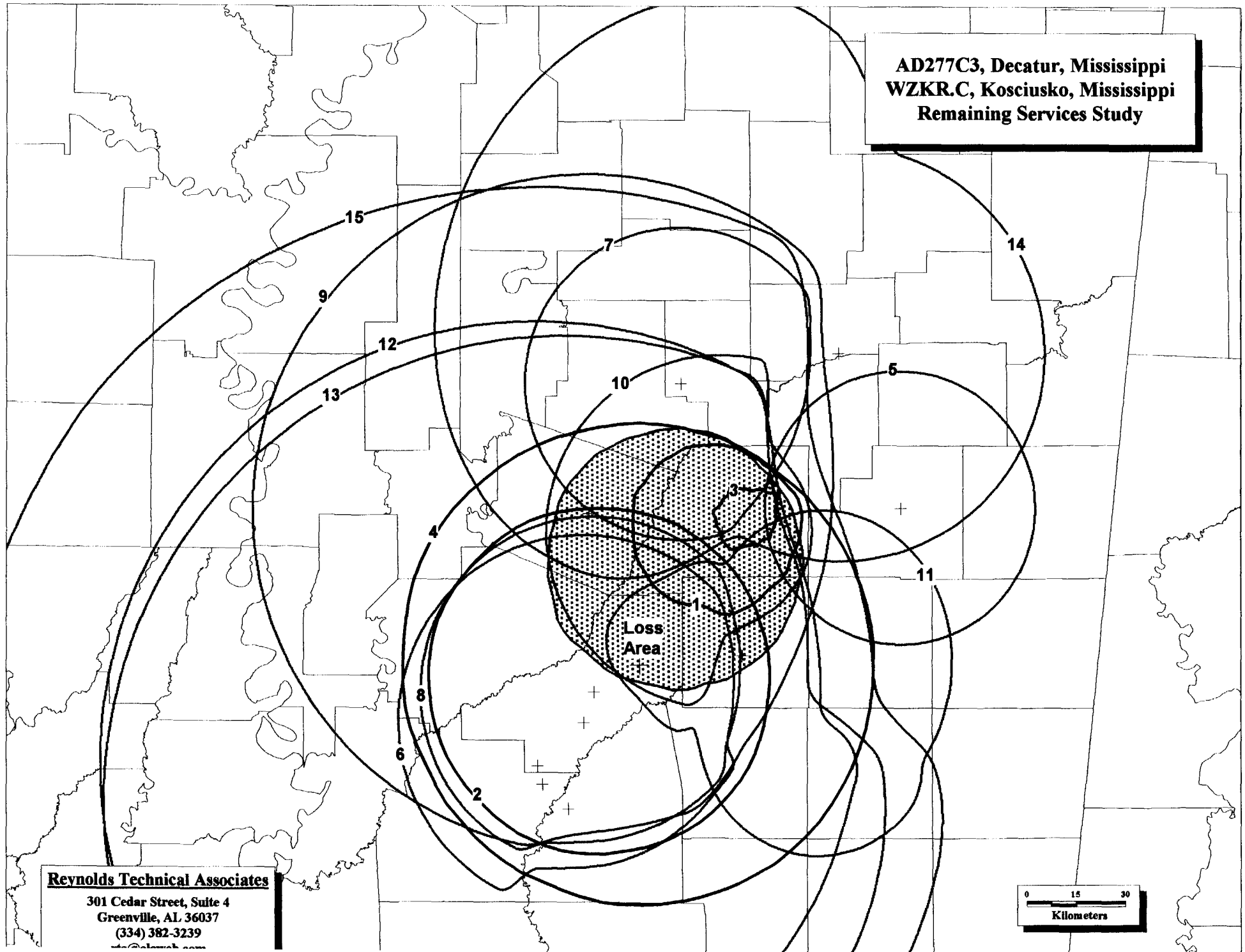
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**AD277C3, Decatur, Mississippi
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Remaining Services Study**



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Engineering Statement

In Support of a

Counterproposal

**MM Docket 98-154
RM 91-74**

Rainey Broadcasting, Inc.

Stations included in Remaining Services Study

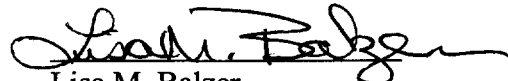
<u>Contour Number</u>	<u>Call Letters</u>	<u>City of License</u>	<u>Frequency</u>
1	WLIN-FM	Durant, Mississippi	101.1
2	WYJS-FM	Pickens, Mississippi	105.9
3	WJTA-FM	Kosciusko, Mississippi	91.7
4	WBKJ-FM	Kosciusko, Mississippi	105.1
5	WLSM-AM	Louisville, Mississippi	1270
6	WONG-AM	Canton, Mississippi	1150
7	WONA-AM	Winona, Mississippi	1570
8	WMGO-AM	Canton, Mississippi	1370
9	WXTN-AM	Lexington, Mississippi	1000
10	WKOZ-AM	Kosciusko, Mississippi	1340
11	WSSI-AM	Carthage, Mississippi	1080
12	WLRM-AM	Ridgeland, Mississippi	780
13	WWDF-AM	Richland, Mississippi	720
14	WEPA-AM	Eupora, Mississippi	710
15	WJDS-AM	Jackson, Mississippi	620

Exhibit E, Figure 6

CERTIFICATE OF SERVICE

I, Lisa M. Balzer, do hereby certify that on this 19th day of October, 1998, I have hand delivered the foregoing "COMMENTS" to the following:

Ms. Nancy V. Joyner
Allocations Branch
Federal Communications Commission
Mass Media Bureau
2000 M Street, NW
Room 557
Washington, DC 20554



Lisa M. Balzer